

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>	§	
	§	<b>CASE No. 20-50805-rbk</b>
<b>KRISJENN RANCH, LLC</b>	§	
	§	<b>CHAPTER 11</b>
<b>DEBTOR.</b>	§	<b>(Jointly Administered)</b>

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<b>KRISJENN RANCH, LLC, ET AL.</b>	§	
	§	
<b>PLAINTIFFS,</b>	§	
	§	<b>Adversary No. 20-05027-rbk</b>
<b>vs.</b>	§	
	§	
<b>DMA PROPERTIES, INC. ET AL.</b>	§	
	§	
<b>DEFENDANTS.</b>	§	

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**MOTION FOR EXPEDITED CONSIDERATION OF KRISJENN RANCH, LLC,  
KRISJENN RANCH, LLC-SERIES UVALDE RANCH, KRISJENN RANCH, LLC-  
SERIES PIPELINE ROW, AND LARRY WRIGHT’S MOTION TO ABATE; LARRY  
WRIGHT’S APPLICATION FOR TEMPORARY INJUNCTION AND REQUEST FOR  
EVIDENTIARY HEARING; AND LARRY WRIGHT’S MOTION FOR SATISFACTION  
OF ATTORNEY’S FEES JUDGMENT BY RECOUPMENT OR SETOFF  
(Reference Docket Nos. 456, 457, & 458)**

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COMES NOW, KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; KrisJenn Ranch, LLC-Series Pipeline ROW (collectively, “KrisJenn”); and Larry Wright (“Wright”) (collectively, the “Movants”) and files this *Motion for Expedited Consideration* (“Motion to Expedite”) of the *Motion to Abate* (Docket No. 456), *Application for Temporary Injunction and Request for Evidentiary Hearing* (Docket No. 458), and *Motion for Satisfaction of Attorney’s Fees Judgement by Recoupment or Setoff* (Docket No. 457) (collectively, the “Motions”), and in support thereof, the Movants would respectfully show as follows:

1. Underlying Motions:

The *Motion to Abate* seeks an abatement of all post-judgment collection efforts until a date after the trial on the Express H2O Suit, which is set for September 9, 2025.

The *Application for Temporary Injunction and Request for Evidentiary Hearing* seeks an injunction to stop Defendants DMA Properties, Inc. and Longbranch Energy, LP, and each of their agents and representatives, from interfering in any and all efforts to clear the title of the ROW and to market and sell the ROW made the basis of this lawsuit. The requested injunctive relief is necessary in order to protect the integrity and performance of the Court's Judgment that created a constructive trust in the hands of Express H2O Pipeline & ROW, LLC for the development or sale of the ROW.

The *Motion for Satisfaction of Attorney's Fees Judgement by Recoupment or Setoff* seeks an order acknowledging satisfaction of the \$750,000 attorney's fees judgment to Defendants through a deduction of Wright's award of \$4,700,000 under the same judgment.

2. Need for Expedited Consideration of the Motions: With respect to the *Motion to Abate* and the *Motion for Satisfaction of Attorney's Fees Judgement by Recoupment or Setoff*, the Movants request expedited consideration of the Motions because, as this Court will recall at the last hearing on this matter, undersigned counsel advised the Court to expect a motion to abate and possibly a motion for recoupment. Further, on June 20, 2025, the Court entered an Order at Docket No. 452 requiring Mr. Wright to provide responses and objection to the numerous document requests by July 15, 2025 and sit for a deposition no later than August 8, 2025. Mr. Wright and KrisJenn adamantly believe that the trial ones of producing documents and preparing for and sitting for a deposition will be disruptive to the Wright's preparations for the Express H2O Suit, which, as this Court is aware, is currently set to go to trial September 9, 2025. Accordingly,

KrisJenn and Wright would like to have the *Motion to Abate* and the *Motion for Satisfaction of Attorney's Fees Judgement by Recoupment or Setoff* heard as soon as practicable because if this Court were to grant either of them, it would permit Mr. Wright to focus his attention fully on the Express H2O Suit.

With respect to the *Application for Temporary Injunction and Request for Evidentiary Hearing*, KrisJenn and Wright would like that heard as promptly as possible because they believe that the Defendants are actively interfering with, and will continue to interfere with, their efforts to sell and market the ROW.

3. Time Estimate for Hearing: Movants believe 2 hours for all three pleadings should be sufficient, given the interim and/or expedited nature of the relief requested.

4. Deadline for when hearing is needed: Movants request a hearing from the Court to be heard by July 7, 2025.

**WHEREFORE**, Movants request that the instant Motion to Expedite be granted and that the Court grants such other relief as the Court deems just and proper.

Dated: June 27, 2025

Respectfully submitted,

**HAYWARD PLLC**

By: /s/ Charlie Shelton

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***Counsel for the Movants***

**CERTIFICATE OF CONFERENCE**

On June 27, 2025, I conferred with lead counsel for the Defendants, Mr. Krist, and he indicated that they opposed expedited hearing with respect to all three motions on the basis they are involved in “intensive summary judgment briefing” that is due July 7, 2025.

/s/ Charlie Shelton  
Charlie Shelton

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2025, a true and correct copy of the foregoing has been served electronically via the Court's CM/ECF system upon the parties receiving electronic notice. Additionally, on June 27, 2025, or within one business day thereof, the foregoing was served via U.S. First Class Mail to all parties listed below.

<p>COBB AND JOHNS  Attn: Christopher S. Johns  14101 Highway 290 West, Suite 400A  Austin, Texas 78737  Telephone: (512) 399-3150  Facsimile: (512) 572-8005  cjohns@cobbjohns.com</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>	<p>CLEVELAND KRIST PLLC  Attn: Timothy Cleveland &amp; Austin Krist  303 Camp Croft Road, Suite 325  Austin, Texas 78746  Telephone: (512) 689-8698  tcleveland@clevelandkrist.com  akrist@clevelandkrist.com</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>
<p>JF DUKE AND ASSOCIATES  Attn: Jeffery Duke  11818 Great Oaks Drive  College Station, Texas 77494  jeff@jfduke.com</p> <p><b><i>Attorneys for Longbranch Energy, LP</i></b></p>	<p>LANGLEY &amp; BANACK, INC.  Attn: Natalie Wilson  745 East Mulberry Avenue, Suite 700 San Antonio, TX 78212  Telephone: 210-736-6600  Facsimile: (210) 735-6889  nwilson@langleybanack.com</p> <p><b><i>Attorneys for DMA Properties, Inc. and Frank Daniel Moore</i></b></p>
<p>BURNS &amp; BLACK PLLC  Attn: Michael Black  750 Rittiman Road  San Antonio, Texas 78209  Telephone: 210-829-2022  Facsimile: 210-829-2021 fax  mblack@burnsandblack.com</p> <p><b><i>Attorneys for Longbranch Energy, LP</i></b></p>	<p>CJ MULLER &amp; ASSOCIATES, PLLC  Attn: C. John Muller  111 W. Sunset Rd.  San Antonio, Texas 78209  Telephone: (210) 664-5000  John.muller@cjma.law</p> <p><b><i>Counsel for KrisJenn Ranch, LLC, Krisjenn Ranch, LLC—Series Uvalde Ranch, KrisJenn Ranch, LLC—Series Pipeline Row</i></b></p>
<p>OFFICE OF THE U.S. TRUSTEE  Attn: James Rose  903 San Jacinto Blvd, Room 230  Austin, TX 78701  james.rose@usdoj.gov</p> <p><b><i>United States Trustee</i></b></p>	<p>THE SMEBERG LAW FIRM, PLLC  Attn: Ronald J. Smeberg  2010 W Kings Hwy  San Antonio, TX 78201-4926  ron@smeberg.com</p>

/s/ Charlie Shelton  
Charlie Shelton